

### **REMARKS**

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 1-10 are presently active in this case. The present Amendment amends Claims 1-9 and adds new Claim 10 without introducing any new matter.

The outstanding Office Action objected to the specification, abstract, drawings and Claims 2-8 because of informalities. Claims 2-6 and 9 were rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the enablement requirement. Claims 1-6 were rejected under 35 U.S.C. §112, second paragraph, as indefinite. Claims 1-4 and 7 were rejected under 35 U.S.C. §102(e) as anticipated by Inoue et al. (U.S. Patent No. 6,442,616, herein "Inoue"). Claims 5-6, 8 and 9 were rejected under 35 U.S.C. §103(a) as unpatentable over Inoue.

In response to the objections to the Specification and the Abstract, the Specification is amended and the Abstract of the Disclosure is rewritten to correct the noted informalities, grammatical and idiomatic errors, and to be made consistent with the changes to the drawings. In light of their formal nature, the changes to the Specification and Abstract do not raise a question of new matter.

In response to the objection to the Drawings, submitted herewith is a Letter Submitting Drawing Sheets along with 11 Replacement Sheets for Figures 1-6, 9, 11, 14, 16 and 18. In particular, Figures 1-5 are amended to be labeled as "Background Art," in accordance with MPEP §608.01(b). Figures 1, 6, 14 and 18 are amended to delete the reference numeral 25. Figures 9 and 11 are amended to recite "Reserved" instead of "Reversed" to correct a typographical error.<sup>1</sup> Figure 16 is amended to delete the reference numeral 615. Further, Applicants' Specification is amended at page 4, line 2 to recite "from

---

<sup>1</sup> Finds non-limiting support in Applicant's Disclosure as originally filed, for example at page 15, lines 1-8 and in Figure 3.

the HA 16 to the FA 17 via path 24” and is amended at page 15, line 1 to recite “unused reserved area 31.” Since these changes are supported by the Specification and by the Figures as originally filed, they are not believed to raise a question on new matter.

In response to the objection to Claims 2-5 and 7-8, the rejection of Claims 2-6 and 9 under 35 U.S.C. §112, first paragraph, and the rejection of 1-9 under 35 U.S.C. §112, second paragraph, Claims 1-9 are amended to correct the noted informalities. In particular, Claim 6 is amended to recite “adding an address translation information request for requesting the global address mapped to the private sender address to a translation request sent from a foreign agent configured to manage said second network to a home agent configured to manage said first network.”<sup>2</sup> Further, Claims 2 and 9 are amended to recite “the node being currently moved into said second network”<sup>3</sup> and new Claim 10 recites a similar feature, depending upon Claim 1. In view of amended Claims 1-9, it is believed that all pending claims are definite and no further rejection on that basis is anticipated. If, however, the Examiner disagrees, the Examiner is invited to telephone the undersigned who will be happy to work with the Examiner in a joint effort to derive mutually acceptable language.

In response to the rejections of Claims 1-4 and 7 under 35 U.S.C. §102(b) and of Claims 5-6 and 8-9 under 35 U.S.C. §103(a), Applicants respectfully request reconsideration of these rejections and traverse the rejections, as discussed next.

Claims 1, 2 and 7-9 are amended to recite “by mapping the global address to the private sender address by translation.” This feature finds non-limiting support in the disclosure as originally filed, for example at page 13, lines 20-23 and in corresponding Figure 8.

---

<sup>2</sup> Finds non-limiting support in Applicant’s as originally filed, for example from page 23, line 23 to page 24, line 2.

<sup>3</sup> Idem at page 9, lines 14-19.

Briefly recapitulating, Claim 1 relates to a method for packet communication including: sending a packet, by a node configured to be moved among different networks, the packet including a private sender address; changing the private sender address to a global address, even when the sending is performed in any of the different networks by mapping the global address to the private sender address by translation. Independent Claims 2 and 7-9 recite similar features. As explained in Applicants' Specification at page 9, lines 14-19 with corresponding Figure 6, Applicants' invention improves upon background method for packet communications because a sender address of a packet received in a correspondent node does not change before and after the movement of the node, and therefore it can reduce interruptions of communication.

Turning now to the applied reference, Inoue discloses a method for communication control of mobile computers in a communication network, wherein a communication with the mobile computer is carried out by routing data to the external network through a global address.<sup>4</sup> However, Inoue fails to teach changing the private sender address to a global address by mapping the global address to the private sender address by translation. Inoue discloses a table with three types of addresses, including an H-address and an M-address, wherein the H-address is specific to the mobile computer in the own organization network and the M-address is an address uniquely defined over all networks.<sup>5</sup> Further, Inoue explains that the H-address is replaced by the M-address.<sup>6</sup> Reading Inoue, one of ordinary skill in the art would understand that existing addresses are replaced by using values from a table. Replacing a home address with a mobile address based on data from a table, as taught by Inoue, *is not* changing the private sender address to a global address, by mapping the global address to the private sender address by translation, as claimed by Applicants.

---

<sup>4</sup> See Inoue in the Abstract.

<sup>5</sup> See Inoue at column 5, lines 50-64 and in corresponding Figure 2.

<sup>6</sup> See Inoue at column 12, lines 1-5.

Inoue also fails to teach or suggest the feature regarding receiving the packet from the node by the address changing means, *the node being currently moved* into the second network, as recited in independent Claims 2 and 9. Inoue teaches that the H-address is replaced by the corresponding M-address and that *subsequently* the packet is transferred to the corresponding host.<sup>7</sup>

Furthermore, there is no evidence for a motivation to modify the teachings from Inoue so as to arrive at Applicants' Claims 5-6 and 8-9. The position that these teachings *could be* modified to arrive at the claimed inventions would be insufficient to establish a prima facie case of obviousness.<sup>8</sup> Inoue merely teaches that a home agent HA returns a confirmation response, if it receives a registration request and if that request can be accepted.<sup>9</sup> Applicants respectfully submit that the feature detecting *by an address changing means in the second network* that a response indicating that said node is registered has been sent from a home agent configured to manage said first network to a foreign agent configured to manage said second network, is non-obvious over the teachings of Inoue.

Therefore, the applied reference fails to teach or suggest every feature recited in Applicants' claims, so that Claims 1-9 are patentably distinct over the applied reference. Accordingly, Applicants respectfully traverse, and request reconsideration of, the rejection based on Inoue.<sup>10</sup>

Consequently, in view of the present Amendment, no further issues are believed to be outstanding in the present application, and the present application is believed to be in

---

<sup>7</sup> See Inoue at column 12, lines 1-5.

<sup>8</sup> See MPEP 2143.01 stating that the "fact that references can be combined or modified is not sufficient to establish *prima facie* obviousness"; see also same section stating "[a]lthough a prior art device 'may be capable of being modified to run the way the apparatus is claimed, there must be a suggestion or motivation in the reference to do so,'" (citation omitted).

<sup>9</sup> See Inoue at column 8, lines 4-10.

<sup>10</sup> See MPEP 2131: "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference," (Citations omitted) (emphasis added). See also MPEP 2143.03: "All words in a claim must be considered in judging the patentability of that claim against the prior art."

condition for formal Allowance. A Notice of Allowance for Claims 1-10 is earnestly solicited.

Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact Applicants' undersigned representative at the below listed telephone number.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, P.C.



---

Eckhard H. Kuesters  
Attorney of Record  
Registration No. 28,870

Customer Number  
**22850**

Tel: (703) 413-3000  
Fax: (703) 413 -2220  
(OSMMN 06/04)

**AMENDMENTS TO THE DRAWINGS**

The attached sheets of drawings include changes to Figures 1-6, 9, 11, 14, 16 and 18. These sheets, which include Figures 1-6, 9, 11, 14, 16 and 18, replace the original sheets including Figures 1-6, 9, 11, 14, 16 and 18.

Attachment: 11 Replacement Sheets